

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CORDIA FOSTER and CISLYN VERONA
WRIGHT,

21-cv-11224 (CM)(DF)

Plaintiffs,

- against -

ELYSE DULA a/k/a ELYSE SNOW
and IAN K. SNOW,

Defendants.

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**DEFENDANTS' REVISED TRIAL EXHIBIT LIST TO REFLECT CORRECTED
DESCRIPTIONS, WITHDRAWN EXHIBITS AND DUPLICATIVE EXHIBITS**

Defendants Elyse Dula and Ian K. Snow, by and through their undersigned attorney, respectfully submit the within Revised Trial Exhibit List, which corrects certain of the descriptions set forth in the list of Defendants' exhibits contained in the Proposed Joint Pretrial Order (Doc. No. 29); notes that certain of said exhibits are withdrawn; and identifies certain exhibits that are duplicative of certain exhibits listed by Plaintiffs. The Revised Trial Exhibit List does not list any new or additional trial exhibit that Defendants intend to use on their case in chief.

DEFENDANTS' TRIAL EXHIBIT LIST

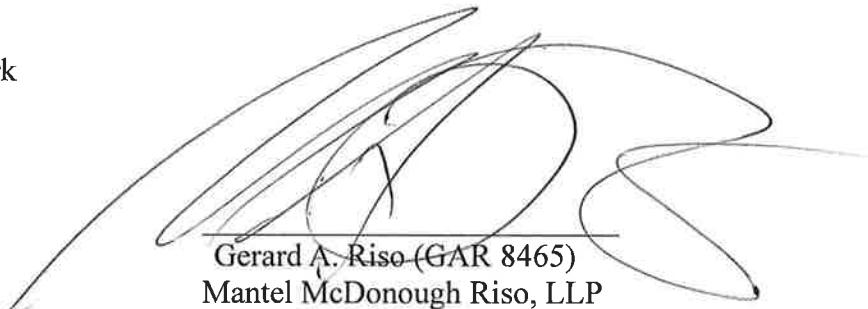
- **DX-1:** Confidentiality Agreement, between Plaintiff Foster and Defendants.
- **DX-2:** Photograph of Plaintiff Foster and Tamela Walsh, contained with text message dated October 8, 2018.
- **DX-3:** Verified Complaint, Bronx Action [**WITHDRAWN**].
- **DX-4:** Message from Plaintiff Foster to Defendant Snow, dated April 3, 2018.

- **DX-5:** Complaint, Federal Action.
- **DX-6:** Messages between Plaintiff Foster and Defendant Dula, dated May 25, 2020; May 26, 2020; and June 23, 2020.
- **DX-7:** Messages between Plaintiff Foster and Defendant Dula, dated June 1, 2018.
- **DX-8:** Messages between Plaintiff Foster and Defendant Dula, dated December 2, 2018. **[SAME AS PX-4]**
- **DX-9:** Messages between Plaintiff Foster and Defendant Dula, dated January 19, 2019; January 30, 2019.
- **DX-10:** Messages between Plaintiff Foster and Tamela Walsh, dated January 19, 2019, January 20, 2019, January 21, 2020; August 19, 2020 and August 20, 2020.
- **DX-11:** Photograph of Joker Mask.
- **DX-12:** Messages between Plaintiff Foster and Defendant Dula, dated June 1, 2018.
- **DX-13:** Messages between Plaintiff Foster and Defendant Dula, dated August 28, 2018.
- **DX-14:** Messages between Plaintiff Foster and Megan Dula, dated February 16, 2020.
- **DX-15:** Photograph of zClock-400W Wi-Fi Hidden Cameral Clock box, contained in message dated August 18, 2020.
- **DX-16:** Letter from Scott A. Lucas to John Crossman, dated September 17, 2021. **[WITHDRAWN]**
- **DX-17:** Message from Liz Little. **[WITHDRAWN]**
- **DX-18:** Message from Liz Little. **[WITHDRAWN]**
- **DX-19:** Messages between Plaintiff Wright and Defendant Snow, dated June 14, 2020.
- **DX-20:** Confidentiality Agreement between Plaintiff Wright and Defendants.
- **DX-21:** Message forwarded to Plaintiff Foster, dated March 23, 2020.
- **DX-22:** Messages between Anna and Plaintiff Wright, dated June 13, 2020.
- **DX-23:** Form SS-8.

- **DX-24:** Messages between Plaintiff Foster and Defendant Ian K. Snow, dated October 28, 2019
- **DX-25:** Messages between Defendant Snow and Plaintiff Foster, dated May 31, 2020; June 11, 2020; June 13, 2020; June 14, 2020; and June 25, 2020. [SAME AS PX-13]
- **DX-26:** Messages between Anna and Plaintiff Wright, dated June 13, 2020.
- **DX-27:** Messages between Marleny Rodriguez and Plaintiff Wright, dated March 23, 2020.
- **DX-28:** Messages between Defendant Snow to Plaintiff Wright, dated January 28, 2020 and May 7, 2020.
- **DX-29:** Messages between Plaintiff Foster and Defendant Dula, dated May 6, 2020.
- **DX-30:** Message appearing on Plaintiff Foster's What's App account, dated June 30, 2020.
- **DX-31:** Deposition Transcript of Cordia Foster, June 14, 2022 [PORTIONS ONLY - CROSS-EXAMINATION]
- **DX-32:** Deposition Transcript of Cislyn Wright, June 15, 2022 [PORTIONS ONLY - CROSS-EXAMINATION]
- **DX-33:** Fifteen Holiday family photographs.
- **DX-34:** Video re Christmas Day at Defendants' home (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial).
- **DX-35:** Video - Easter at Defendants' home (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial.).
- **DX-36:** Video - Easter at Defendants' home (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial.).
- **DX-37:** Expert Report of Gregory Mitchell, Ph.D., dated September 1, 2022. [WITHDRAWN]
- **DX-38:** Response of Gregory Mitchell, Ph.D., to the Rebuttal Report of Jennie Weiner, Ed.D., dated October 17, 2022. [WITHDRAWN]
- **DX-39:** *Curriculum Vitae* of Gregory Mitchell, Ph.D. [WITHDRAWN]

- **DX-40:** Message appearing on Plaintiff Foster's WhatsApp account, dated October 29, 2019.
- **DX-41:** October 19, 2019 audio recording [**WITHDRAWN – no such audio recording exists**].
- **DX-42:** June 2020 video recording containing conversation between Plaintiff Wright and Defendant Dula (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial).
- **DX-43:** June 2020 video recording containing conversation of Plaintiff Wright and Defendant Dula (continuation of DX-42). (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial).
- **DX-44:** June 14, 2020, audio recording of conversation among Plaintiffs Wright and Foster and Defendant Snow (Defendants reserve the right to limit the exhibit to specific excerpts at the time of trial). [**SAME AS PX-14**].
- **DX-45:** June 6, 2018 Amazon Receipt for Joker mask [**SAME AS PX-11**]

Dated: October 19, 2023
New York, New York



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